

**PREPARED TESTIMONY  
WILLIAM A. MONSEN**

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**Electricity Revenue Allocation, Rate Design, and Rate Surcharges**

1. CPUC Application 01-08-028  
Direct Testimony on Behalf of Bear Mountain, Inc. in the Matter of Southern California Water Company’s Application to Increase Rates for Electric Service in the Bear Valley Electric Customer Service Area. December 20, 2001.
2. CPUC Application 00-10-045; 01-01-044  
Direct Testimony on Behalf of the City of San Diego. May 29, 2002.
3. CPUC Application 00-11-038  
Testimony on Behalf of the Alliance for Retail Energy Markets in the Bond Charge Phase of the Rate Stabilization Proceeding. July 17, 2002.
4. CPUC Application 05-02-019  
Testimony of William A. Monsen SDG&E’s 2005 Rate Design Window Application on Behalf of the City of San Diego. June 24, 2005.
5. CPUC Application 05-01-016  
Prepared Testimony of William A. Monsen Regarding SDG&E's Default Critical Peak Pricing Proposal on Behalf of the City of San Diego. October 5, 2005.
6. CPUC Application 07-01-047  
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of SDG&E for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. August 10, 2007.

7. CPUC Application 08-06-034  
Testimony of William A. Monsen on Behalf of Snow Summit, Inc. Concerning Cost Allocation and Rate Design. January 9, 2009.
8. CPUC Application 08-11-014  
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of San Diego Gas & Electric Company for Authority to Update Cost Allocation and Electric Rate Design. April 17, 2009.
9. Colorado PUC Docket No. 09AL-299E  
Answer Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. in the Matter of Advice Letter No. 1535 of Public Service Company of Colorado to Revise its Colorado PUC No. 7 Electric Tariff to Reflect Revised Rates and Rate Schedules to be Effective on June 5, 2009. October 2, 2009.
10. Colorado PUC Docket No. 09AL-299E  
Supplemental Answer Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. in the Matter of Advice Letter No. 1535 of Public Service Company of Colorado to Revise its Colorado PUC No. 7 Electric Tariff to Reflect Revised Rates and Rate Schedules to be Effective on June 5, 2009. October 8, 2009.
11. Colorado PUC Docket No. 09AL-299E  
Surrebuttal Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. in the Matter of Advice Letter No. 1535 of Public Service Company of Colorado to Revise its Colorado PUC No. 7 Electric Tariff to Reflect Revised Rates and Rate Schedules to be Effective on June 5, 2009. December 18, 2009.
12. CPUC Application 11-10-002  
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of San Diego Gas & Electric Company for Authority to Update Marginal Costs, Cost Allocations, and Electric Rate Design. June 12, 2012.
13. CPUC Application 12-02-013  
Testimony of William A. Monsen on Behalf of Snow Summit, Inc. Concerning Revenue Requirement, Marginal Costs, and Revenue Allocation. July 27, 2012.
14. CPUC Application 12-02-013  
Rebuttal Testimony of William A. Monsen on Behalf of Snow Summit, Inc. in Response to the Division of Ratepayer Advocates' Opening Testimony. August 27, 2012.
15. California PUC Rulemaking 12-06-013  
Testimony of William A. Monsen on Behalf of Vote Solar Concerning Residential Electric Rate Design Reform. September 15, 2014.

16. CPUC Application 14-01-027  
Testimony of William A. Monsen on Behalf of the City Of San Diego Concerning the Application of SDG&E for Authority to Update Electric Rate Design. November 14, 2014.
17. CPUC Application 14-01-027  
Rebuttal Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of SDG&E for Authority to Update Electric Rate Design. December 12, 2014.
18. CPUC Application 14-06-014  
Opening Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association Regarding Standby Rates in Phase 2 of SCE's 2015 Test Year General Rate Case. March 13, 2015.
19. Public Utilities Commission of Nevada Docket Nos. 15-07041 and 15-07042  
Prepared Direct Testimony of William A. Monsen On Behalf of the Alliance for Solar Choice (TASC). October 27, 2015.
20. Arizona Corporation Commission Docket No. E-00000J-14-0023  
Rebuttal Testimony of William A. Monsen on Behalf of the Alliance for Solar Choice (TASC). April 7, 2016.
21. Arizona Corporation Commission Docket No. E-01461A-15-0363  
The Energy Freedom Coalition of America's (EFCA) Notice of Direct Testimony of William A. Monsen. June 1, 2016.
22. Public Utilities Commission of the State of Colorado Proceeding No. 16AL-0048-E  
Answer Testimony of William A. Monsen on Behalf of Vail Summit Resorts, Inc. June 6, 2016.
23. CPUC Application 15-04-012  
Direct Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. July 5, 2016.
24. Arizona Corporation Commission Docket No. E-01461A-15-0363  
The Energy Freedom Coalition of America's (EFCA) Direct Testimony of William A. Monsen and Patrick J. Quinn. July 29, 2016.
25. Arizona Corporation Commission Docket No. E-01461A-15-0363  
The Energy Freedom Coalition of America's (EFCA) Rebuttal Testimony of William A. Monsen. August 15, 2016.
26. CPUC Application 15-04-012  
Rebuttal Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. October 14, 2016.

27. CPUC Application 15-04-012  
Joint Supplemental Testimony of Cynthia Fang on Behalf of San Diego Gas & Electric Company, R. Thomas Beach on Behalf of The Solar Energy Industries Association, Maurice Brubaker on Behalf of The Federal Executive Agencies, And William A. Monsen on Behalf of the City of San Diego. November 14, 2016.
28. CPUC Application 15-04-012  
Joint Supplemental Testimony of Cynthia Fang on Behalf of San Diego Gas & Electric Company, Nathan Chau on Behalf of The Office of Ratepayer Advocates, William Monsen on Behalf of the City of San Diego and Alison M. Lechowicz on Behalf of the California City-County Street Light Association. November 16, 2016.
29. CPUC Application A.16-06-013  
Direct Testimony of William A. Monsen on Behalf of South San Joaquin Irrigation District. March 15, 2017.
30. CPUC Application A.16-09-003  
Direct Testimony of William A. Monsen and Anna Casas on Behalf of the California Solar Energy Industries Association in Southern California Edison's Rate Design Window Application. April 28, 2017.
31. CPUC Application A.17-05-004  
Direct Testimony of William A. Monsen on Behalf of Snow Summit LLC in Bear Valley Electric Services General Rate Case Application. September 29, 2017.
32. CPUC Application A.17-05-004  
Rebuttal to Testimony by the Office of Ratepayer Advocates by William A. Monsen on Behalf of Snow Summit LLC in Bear Valley Electric Services General Rate Case Application. October 27, 2017.
33. Superior Court of California, County of San Diego Case No. 37-2015-00014540-CU-MC-CTL  
Declaration in Support of Defendant's Motion for Summary Judgement, or in the Alternative, Motion for Summary Adjudication. February 3, 2018.
34. CPUC Application 17-06-030  
Testimony of William A. Monsen on Behalf of the Coalition for Affordable Street Lights Concerning Street Light Rates and LED Conversions. March 23, 2018.
35. CPUC Application 18-03-003  
Prepared Joint Testimony of Brandon Charles on Behalf of the California Farm Bureau Federation, William A. Monsen on Behalf of the City of San Diego and Cynthia Fang on Behalf of San Diego Gas and Electric Company. August 20, 2018.

36. CPUC Application 18-03-003  
Prepared Supplemental Testimony of Brandon Charles on Behalf of the California Farm Bureau Federation, William A. Monsen on Behalf of the City of San Diego and Cynthia Fang on Behalf of San Diego Gas and Electric Company. September 27, 2018.
37. CPUC Application 19-03-002  
Direct Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. April 6, 2020.
38. CPUC Application 19-11-019  
Direct Testimony of William A. Monsen and Carlo Bencomo-Jasso on Behalf of the California Farm Bureau Federation Concerning Revenue Allocation and Agricultural Rate Design in Application. November 20, 2020.
39. CPUC Application 19-11-019  
Reply Testimony of William A. Monsen and Carlo Bencomo-Jasso on Behalf of the California Farm Bureau Federation Concerning Revenue Allocation and Agricultural Rate Design in Application 19-11-019. February 26, 2021.

#### **Electricity Market Structure and Stranded Cost Recovery**

1. CPUC Rulemaking 94-04-031 and Investigation 94-04-032  
Prepared Testimony Regarding Transition Costs for the Independent Energy Producers. December 5, 1994.
2. Massachusetts Department of Telecommunications and Energy D.T.E. 97-120  
Direct Testimony Regarding Nuclear Cost Recovery for the Commonwealth of Massachusetts Division of Energy Resources. October 23, 1998.
3. CPUC Application 97-12-039  
Direct Testimony on Behalf of California Cogeneration Council. June 8, 1999.
4. CPUC Application 97-12-039  
Prepared Direct Testimony Evaluating an Auction Proposal by SDG&E on Behalf of the California Cogeneration Council. June 15, 1999.
5. CPUC Application 99-09-053  
Prepared Direct Testimony Regarding PG&E's Proposed Divestiture of its Hydroelectric Facilities on Behalf of the Independent Energy Producers Association. March 2, 2000.
6. CPUC Application 99-09-053  
Prepared Rebuttal Testimony Regarding PG&E's Proposed Divestiture of its Hydroelectric Facilities on Behalf of the Independent Energy Producers Association. March 16, 2000.

7. Arizona Docket Numbers E-00000A-02-0051, E-01345A-01-0822, E-0000A-01-0630, E-01933A-98-0471, E01933A-02-0069  
Rebuttal Testimony on Behalf of AES NewEnergy, Inc. and Strategic Energy L.L.C.:  
Track A Issues. June 11, 2002.
8. CPUC Rulemaking 03-10-003  
Opening Testimony of William A. Monsen Regarding Phase One Issues Related to  
Implementation of Community Choice Aggregation on Behalf of Local Government  
Commission. April 15, 2004.
9. CPUC Rulemaking 03-10-003  
Reply Testimony of William A. Monsen Regarding Phase One Issues Related to  
Implementation of Community Choice Aggregation on Behalf of Local Government  
Commission. May 7, 2004.
10. CPUC Application 10-05-006  
Testimony of William Monsen on Behalf of the Independent Energy Producers  
Association in Track III of the Long-Term Procurement Planning Proceeding Concerning  
Bid Evaluation. August 4, 2011.
11. CPUC Rulemaking 12-03-014  
Reply Testimony of William A. Monsen on Behalf of the Independent Energy Producers  
Association Concerning Track One of the Long-Term Procurement Proceeding. July 23,  
2012.
12. CPUC Application 12-03-026  
Testimony of William A. Monsen on Behalf of the Independent Energy Producers  
Association Concerning PG&E's Proposed Acquisition of the Oakley Project. July 23,  
2012.
13. CPUC Application 12-03-026  
Rebuttal Testimony of William A. Monsen on Behalf of the Independent Energy  
Producers Association Concerning PG&E's Proposed Acquisition of the Oakley Project.  
August 3, 2012.
14. CPUC Rulemaking 12-03-014  
Testimony of William A. Monsen on Behalf of the Independent Energy Producers  
Association Concerning Track 4 of the Long-Term Procurement Plan Proceeding.  
September 30, 2013.
15. CPUC Rulemaking 12-03-014  
Rebuttal Testimony of William A. Monsen on Behalf of the Independent Energy  
Producers Association Concerning Track 4 of the Long-Term Procurement Plan  
Proceeding. October 14, 2013.

## **Qualifying Facilities and Avoided Cost Calculations**

1. CPUC Application 90-10-003  
Prepared Testimony with Mark A. Bachels Regarding the Value of Qualifying Facilities and the Determination of Avoided Costs for SDG&E for the Kelco Division of Merck & Company, Inc. December 21, 1990.
2. CPUC Rulemaking 99-11-022  
Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs. May 7, 2001.
3. CPUC Rulemaking 99-11-022  
Rebuttal Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs. May 30, 2001.
4. Sonoma County Assessment Appeals Board Application Nos.: 01/01-137 through 157  
Testimony of William A. Monsen Regarding the Market Price Electricity in the Matter of the Application for Reduction of Assessment of Geysers Power Company, LLC, Sonoma County Appeals Board on Behalf of Calpine. September 10, 2004.
5. CPUC Rulemaking 04-04-025; R.04-04-003  
Prepared Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. August 31, 2005.
6. CPUC Rulemaking 04-04-025; R.04-04-003  
Prepared Rebuttal Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. October 28, 2005.
7. CPUC Rulemaking 04-04-025; R.04-04-003  
Errata to Prepared Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. January 27, 2006.
8. CPUC Rulemaking 04-04-025; R.04-04-003  
Errata to Prepared Rebuttal Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. January 27, 2006.
9. American Arbitration Association Case No. 01-16-0005-1073  
Expert Report of William A. Monsen on Behalf of Saguaro Power Company. September 15, 2017.

## **Electricity Resource Planning**

1. CPUC Rulemaking 01-10-024  
Prepared Direct Testimony on Behalf of Independent Energy Producers and Western Power Trading Forum. May 31, 2002.

2. CPUC Rulemaking 01-10-024  
Rebuttal Testimony on Behalf of Independent Energy Producers and Western Power Trading Forum. June 5, 2002.
3. CPUC Rulemaking 01-10-024  
Prepared Testimony in the Renewable Portfolio Standard Phase on Behalf of Center for Energy Efficiency and Renewable Technologies. April 1, 2003.
4. CPUC Rulemaking 01-10-024  
Direct Testimony Regarding Long-term Resource Planning Issues on Behalf of the City of San Diego. June 23, 2003.
5. CPUC Rulemaking 04-04-003  
Direct Testimony of William A. Monsen Regarding the 2004 Long-Term Resource Plan of San Diego Gas & Electric Company on Behalf of the City of San Diego. August 6, 2004.
6. Nevada Public Utilities Commission Docket No. 06-06051 and 06-07010  
Testimony of William A. Monsen on Behalf of the Nevada Resort Association Regarding Integrated Resource Planning. September 13, 2006.
7. Colorado Public Utilities Commission Docket No. 05A-543E  
Answer Testimony of William A. Monsen on Behalf of AES Corporation and the Colorado Independent Energy Association. April 18, 2006.
8. Colorado Public Utilities Commission Docket No. 07A-447E  
Answer Testimony and Exhibits of William A. Monsen. April 2008.
9. Public Service Company of Colorado Docket No. 11A-869E  
Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. June 4, 2012.
10. Public Utilities Commission of the State of Colorado Docket No. 11A-869E  
Supplemental Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. September 14, 2012.
11. Public Utilities Commission of the State of Colorado Docket No. 11A-869E  
Supplemental Cross Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. October 5, 2012.
12. Public Utilities Commission of the State Oregon Docket No. UM 1182  
Northwest and Intermountain Power Producers Coalition Direct Testimony of William A. Monsen. November 16, 2012.



13. Public Utilities Commission of the State Oregon Docket No UM 1182  
Northwest and Intermountain Power Producers Coalition Exhibit 300 Witness Reply  
Testimony of William A. Monsen. January 14, 2013.
14. Public Utilities Commission of Nevada Docket No. 14-05003  
Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc. August 25,  
2014.
15. CPUC Rulemaking 13-12-010  
Opening Testimony of William A. Monsen on Behalf of the Independent Energy  
Producers Association Regarding Phase1A of the 2014 Long-Term Procurement  
Planning Proceeding. September 24, 2014.
16. CPUC Rulemaking 13-12-010  
Testimony of William A. Monsen on Behalf of the Independent Energy Producers  
Association Regarding Supplemental Testimony in Phase1A of the 2014 Long-Term  
Procurement Planning Proceeding. December 18, 2014.
17. Public Utilities Commission of the State of Hawaii Docket No. 2015-0022  
Direct Testimony on Behalf of AES Hawaii, Inc. July 20, 2015.
18. Public Utilities Commission of Nevada Docket No. 16-07001 and 16-08027  
Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc. November 10,  
2016.
19. Public Utilities Commission of Nevada Docket No. 16-07001 and 16-08027  
Supplemental Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc.  
November 17, 2016.
20. Public Utilities Commission of the State of Colorado Proceeding No. 16A-0396E  
Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy  
Association. December 9, 2016.
21. Public Utilities Commission of the State of Colorado Docket No. 21A-0141E  
Hearing Exhibit No. 1000 Answer Testimony and Attachments of William A. Monsen on  
Behalf of the Colorado Independent Energy Association. October 11, 2021.

### **Distributed Generation and Demand Response**

1. CPUC Application 99-10-025  
Joint Testimony Regarding Auxiliary Load Power and Stand-by Metering Policy on  
Behalf of Duke Energy North America. July 3, 2000.
2. CPUC Application 99-03-014  
Joint Testimony Regarding Auxiliary Load Power and Stand-by Metering Policy on  
Behalf of Duke Energy North America. September 29, 2000.

3. CPUC Application 03-03-029  
Testimony William A. Monsen Regarding Auxiliary Load Power Metering Policy and Standby rates on Behalf of Duke Energy North America. October 3, 2003.
4. CPUC Rulemaking 04-03-017  
Testimony of William A. Monsen Regarding the Itron Report on Behalf of the City of San Diego. April 13, 2005.
5. CPUC Rulemaking 04-03-017  
Rebuttal Testimony of William A. Monsen Regarding the Cost Effectiveness of Distributed Energy Resources on Behalf of the City of San Diego. April 28, 2005.
6. CPUC Application 08-06-001, 08-06-002, 08-06-003  
Prepared Testimony of William A. Monsen on Behalf of the California Demand Response Coalition Concerning Demand Response Cost-Effectiveness and Baseline Issues. November 24, 2008.
7. CPUC Application 08-06-001, 08-06-002, 08-06-003  
Prepared Testimony of William A. Monsen on Behalf of the California Demand Response Coalition Concerning Demand Response Cost-Effectiveness and Baseline Issues (Revised with Errata 1-7-09). November 24, 2008.

### **Electricity, Other**

1. CPUC Applications 90-08-066, 90-08-067, 90-09-001  
Prepared Testimony with Aldyn W. Hoekstra Regarding the California-Oregon Transmission Project for Toward Utility Rate Normalization (TURN). November 29, 1990.
2. CEC Docket No. 93-ER-94  
Rebuttal Testimony Regarding the Preparation of the 1994 Electricity Report for the Independent Energy Producers Association. December 10, 1993.
3. CPUC Application 13-07-021  
Response Testimony of William A. Monsen on Behalf of Interwest Energy Alliance Regarding the Proposed Merger of NV Energy, Inc. with Midamerican Energy Holdings Company. October 24, 2013.
4. CPUC Application 14-04-014  
Opening Testimony of William A. Monsen on Behalf of ChargePoint, Inc. Regarding SDG&E's Vehicle Grid Integration Pilot Program. March 16, 2015.
5. Federal Energy Regulatory Commission Docket Nos. EL02-60-007 and EL02-62-006 (Consolidated)  
Prepared Answering Testimony of William A. Monsen on Behalf of Iberdrola Renewables Regarding Rate Impacts of the Iberdrola Contract. July 21, 2015.

6. James Arbitration Case No: 1220049998  
Declaration of William A. Monsen on Behalf of Watson Cogeneration Company and Camino Energy, LLC. January 11, 2017.
7. American Arbitration Association Case No. 01-16-0002-2121  
Claimant Buena Vista Biomass Power, LLC's Expert Witness Disclosure. August 18, 2017.
8. JAMS Arbitration No. 1100088728  
Expert Report by William A. Monsen for Aera Energy, LLC. July 24, 2018.
9. JAMS Arbitration No. 1100088728  
Conclusions and Summary of Opinions of William A. Monsen for Aera Energy, LLC. July 24, 2018.
10. Rachel Kropp et al vs Southern California Edison Company Case No. BC698926  
Declaration of William A. Monsen on Behalf of Brent & Foil, LLP. December 24, 2020.

#### **Natural Gas Market Structure**

1. CPUC Rulemaking 04-01-025  
Direct Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. July 18, 2005.
2. CPUC Rulemaking 04-12-004  
Direct Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. July 29, 2005.
3. CPUC Rulemaking 04-12-004  
Rebuttal Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. August 26, 2005.
4. CPUC Application 04-12-004  
Prepared Testimony of William A. Monsen Regarding Firm Access Rights on Behalf of Clearwater Port, LLC. July 14, 2006.
5. CPUC Application 04-12-004  
Prepared Rebuttal Testimony of William A. Monsen Regarding Firm Access Rights, on Behalf of Clearwater Port, LLC. July 31, 2006.
6. James Arbitration Case No: 1220049998  
Declaration of William A. Monsen on Behalf of Watson Cogeneration Company and Camino Energy, LLC. January 11, 2017.

## Natural Gas Rate Cases

1. CPUC Application 08-02-001  
Testimony of William A. Monsen on Behalf of the City of Long Beach Gas & Oil Department Concerning the Application of SDG&E and SoCal Gas for Authority to Revise Their Rates Effective January 1, 2009 in their Biennial Cost Allocation Proceeding. June 18, 2008.
2. CPUC Application 08-02-001  
Rebuttal Testimony of William A. Monsen on Behalf of the City of Long Beach Gas & Oil Department Concerning the Application of SDG&E and SoCal Gas for Authority to Revise Their Rates Effective January 1, 2009 in their Biennial Cost Allocation Proceeding. July 10, 2008.
3. CPUC Application 08-02-001  
Testimony of William A. Monsen on Behalf of the City of Long Beach Gas & Oil Department Concerning 12-02-013 and Rate Design Issues in SDG&E and SoCal Gas Biennial Cost Allocation Proceeding. December 23, 2008.
4. CPUC Application 08-02-001  
Rebuttal Testimony of William A. Monsen on Behalf of the City of Long Beach Gas & Oil Department Concerning Revenue Allocation and Rate Design Issues in SDG&E and SoCal Gas Biennial Cost Allocation Proceeding. January 27, 2009.
5. CPUC Application 13-12-012  
Testimony of William A. Monsen on Behalf of Commercial Energy Concerning PG&E's 2015 Gas Transmission and Storage Rate Application. August 11, 2014.
6. CPUC Application 13-12-012/I.14-06-016  
Rebuttal Testimony of William A. Monsen on Behalf of Commercial Energy Concerning PG&E's 2015 Gas Transmission & Storage Application. September 15, 2014.
7. CPUC Application 17-09-006  
Direct Testimony of William A. Monsen on Behalf of The Western Manufactured Housing Communities Association in Pacific Gas & Electric's 2018 Gas Cost Allocation and Rate Design Proceeding. June 20, 2018.